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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, AFL-CIO, *et*
al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, *et al.*,

Defendants.

Case No. 3:25-cv-03698

**DECLARATION OF TYRONE JUE
IN SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY RELIEF**

DECLARATION OF TYRONE JUE

I, Tyrone Jue, declare as follows:

1. I am the Director of the San Francisco Environment Department (SF Environment). I oversee all of SF Environment's activities, which include, among other things, supporting the transition to zero emission vehicles, climate protection and resilience, and programs that promote environmental justice, clean energy infrastructure, and San Francisco's urban biodiversity and ecosystem health. Except where otherwise indicated, the following facts are known to me personally, and if called upon as a witness, I would testify to them competently.

Harms Related to Reorganization of the Environmental Protection Agency

2. SF Environment has already felt serious, negative impacts from the administration's sizeable layoffs across federal agencies. I am aware that the Office of Environmental Justice and External Civil Rights (OEJECR) within the Environmental Protection Agency (EPA), established in 1992 under President George H. W. Bush and long dedicated to environmental justice, has been eliminated and its staff terminated. Since it no longer exists, it can no longer administer grants—impacting not only SF Environment (a recent grantee of this office), but also other prospective grantees, such as San Francisco community-based organizations with separately awarded funds that complement SF Environment's work. Environmental Justice is at the core of SF Environment's mission, and the loss of federal funding and support will hinder our ability to fulfill this mission, detrimentally impacting the health and well-being of communities disproportionately impacted by environmental burdens.

3. Another aspect of SF Environment's mission is to collaborate across city agencies to inform and respond to the acute and long-term effects of climate change, such as extreme heat events, flooding, and sea level rise. For example, in 2023, San Francisco published a Heat and Air Quality Implementation Plan establishing a framework to address the threat caused by local extreme heat and wildfire smoke events. In this planning work and during emergencies, San Francisco relies heavily on weather and climate modeling data provided by the National Oceanic and Atmospheric Administration (NOAA). Adequate staffing at NOAA is essential for the

1 continued provision of this data, which is widely regarded as the most complete, reliable, and up
2 to date. Without it, we cannot develop updated science-based climate mitigation and adaptation
3 strategies, which compromises long-range planning efforts.

4 4. SF Environment also relies on federal data and research to inform our work to
5 electrify all vehicles and buildings in San Francisco. SF Environment oversees programs to help
6 transition all vehicles from non-renewable internal combustion engines to renewable fuels and
7 zero emission vehicles (ZEV). To evaluate the benefits of these programs and make informed
8 policy decision, we rely on EPA research, including studies on the health impacts of fleet
9 electrification. In addition, research funded by the Department of Energy is critical in improving
10 the electric grid reliability necessary to meet national energy demands and to electrify homes and
11 vehicles. The loss of this ongoing research, data, and accompanying benchmarks will hamper SF
12 Environment's ability to make informed decisions and achieve San Francisco's emissions goals.

13 **Harms Related to Reorganization of U.S. Department of Energy**

14 5. Before massive federal layoffs were announced, SF Environment expected to
15 receive funding from the federal government to support several other programs in addition to the
16 aforementioned environmental justice grant. Those programs include developing green building
17 standards, deploying EV charging infrastructure, and continuing to transition city vehicles to
18 ZEVs. In 2024, SF Environment was awarded four grants for these purposes. One was cancelled,
19 and the three others are currently in stasis awaiting information from San Francisco's last known
20 federal program officers on these grants—several of whom are no longer employed at the
21 Department of Energy. We therefore expect that future grant opportunities from Congressionally
22 authorized programs will simply not be available because of a lack of staff to review
23 applications, select grant recipients, and administer the programs. The loss of this critical grant
24 funding will impact our ability to meet San Francisco's building and vehicle electrification goals,
25 leading to continued exposure to harmful indoor and outdoor air pollutants and increased health
26 risks for our communities.

6. Another ongoing program exemplifies this concern. San Francisco has long received federal funding under the Clean Cities Coalition program.¹ As the lead of the San Francisco Clean Cities Coalition (which includes SF Environment),² we have reduced local air pollution by transitioning municipal fleets to renewable diesel and by expanding EV adoption and infrastructure. We expected that future funding through this program would support the expansion of vehicle electrification and charging infrastructure, enabling San Francisco to achieve our goal that all trips beginning in, ending in, or passing through San Francisco will be emissions-free by 2040. Without this federal funding, which we are unlikely to be able to replace, achieving this goal will be more challenging, and San Francisco's environment and residents' health may suffer as a result.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed April 28, 2025 at San Francisco, California.



TYRONE JUE

¹ <https://cleancities.energy.gov/>

² More information is available at <https://www.cleancitiessf.com/>